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**Inquiry:** I have recently reviewed the collection of scope of practice inquiry responses by the Board that are posted on the RCB website. Thank you for posting these very informative statements.

I am requesting clarification regarding the scope of practice of an unlicensed person performing pulmonary function testing. Reference letter #2001-C-27 states that there is no prohibition for an unlicensed person to perform spirometry, MVV and flow volume loop tests. However, reference #2000-C-05 and #2001-C-07 states that complete pulmonary function testing by an unlicensed person is prohibited. Please define the Board's understanding of the term "complete pulmonary function testing."

Reference #2000-C-20 asks about specific pulmonary function testing procedures but the Board responded only to the issue of administration of aerosolized bronchodilators. Does this mean there is no prohibition against an unlicensed person performing lung volume determinations, thoracic gas volumes, diffusing capacity, or flow-volume loops provided they do not administer aerosol medications?

**Response:** Section 3702 describes the practice of Respiratory Care as therapy, management, rehabilitation, diagnostic evaluation, and care of patients with deficiencies and abnormalities that affect the pulmonary system. Based upon that statement, I would include all Pulmonary Function Testing in the category of a diagnostic evaluation. We would therefore conclude that these functions require a licensed practitioner to perform them. Having said that, I will tell you that the Board has recently developed a task force to further review this issue and those associated with sleep studies and home care. As you have noted, there has been a fair amount of confusion surrounding this issue. The question raised during our task force meeting was concerning what qualifications one should have to safely administer pulmonary diagnostic testing. It is our intent to further clarify these functions within the Practice Act to ensure that appropriately trained individuals provide them.

Reference # 2003-C-4